

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau, Jr.,	:	
	:	
Plaintiff,	:	
	:	
	:	
vs.	:	Civil Action
	:	No. 04-10469
	:	JLT(REK)
	:	
Greater Lynn Mental Health	:	
& Retardation Association, Inc.,	:	
et al.	:	
	:	
Defendants.	:	

Joint Proposed Discovery Plan

Defendant Bridgewell, Inc., (formerly Greater Lynn Mental Health & Retardation Assoc.) and plaintiff Albert William Bleau, Jr., having met and conferred, submit the following proposed discovery plan pursuant to Fed.R.Civ.P. 26(f) and 16(b) and (c).

Rule 26(a)(1) Initial Disclosures completed	2/3/06
Rule 33 Interrogatories served by	2/17/06
Rule 34 Requests for Documents served by	2/17/06
Rule 33 and 34 responses completed by	3/21/06
Rule 31 Depositions Upon Written Questions	
Notices served on or after	4/1/06
Rule 30 Depositions completed by	7/14/06

The parties are unable to agree on what changes, if any, should be made to the limitations on discovery imposed under the Federal Rules or by local rule or what other limitations should be imposed. Fed.R.Civ.P. 16(f)(3). The parties therefore request that the Court at this time take up consideration of the 23 November 2005 motion of Mr. Bleau to expand discovery (Docket No. 94) and Bridgewell's opposition thereto and motion for a protective order, which will be filed shortly. The parties also respectfully request that the Court rule on these matters by March 1, 2006, to give the parties time to complete discovery as ordered.

Finally, the parties state that Mr. Bleau has presented a settlement proposal as required by Local Rule 16.1(C), and Bridgewell has declined to pursue settlement on those terms. At the plaintiff's request, a copy of his written settlement demand is attached as exhibit 1.

Respectfully submitted,

Respectfully submitted,
Bridgewell, Inc.
by its attorneys

/s/Albert Bleau
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